

Exhibit “2”

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DECLARATION OF LUKE A. WALKER, ESQ.

I, Luke A. Walker, having first been duly sworn, and under penalty of perjury, state as follows:

1. I am over 18 years of age.

2. I am an attorney representing Scotia International of Nevada, Inc., a Utah corporation, Warren Barber, an individual, and Max Barber, an individual, the Defendants in the lawsuit filed in the United States District, District of Nevada, Case Number 2:19-cv-02077-JCM-EJY.

3. This Declaration is made to supplement the Gunderson Law Firm's Motion to Withdraw as Counsel and pursuant to the Court's order to supplement.

4. I have assisted the lead counsel of record, Mark H. Gunderson, Esq., in our firm's efforts to (1) show cause why the Defendants should not be held in contempt and (2) to attempt to set aside the Defendants' deemed admissions to certain Requests for Admissions.

5. Because we were successful in avoiding contempt but our efforts to set aside the deemed admissions were unsuccessful, we have performed the full scope of the engagement for which we were retained.

6. I have not had any communications with the Defendants for several months. Without reliable timely communication, I will be unable to properly assist the Defendants going forward.

7. Given the current posture of the case, the case is concluded pending dispositive orders from the Court.

8. I declare under penalty of perjury under the law of the State of Nevada that the foregoing is true and correct.

Executed this 15th day of February, 2022.



Luke A. Walker, Esq.